

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

LA UNION DEL PUEBLO ENTERO, et al.,§	§	CIVIL ACTION NO.
Plaintiffs,	§	
	§	
v.	§	5:21-CV-0844-XR
	§	
STATE OF TEXAS, et al.,	§	[Consolidated Action: Lead Case]
Defendants.	§	

**DEFENDANTS MICHAEL SCARPELLO AND JOHN CREUZOT'S
RULE 26(a)(3) PRETRIAL DISCLOSURES**

TO THE HONORABLE COURT:

Defendants Michael Scarpello and John Creuzot ("Dallas County Defendants") pursuant to the Second Amended Scheduling Order entered on March 30, 2023 (ECF No. 579), and Rule 26(a)(3) of the Federal Rules of Civil Procedure, make their pretrial disclosures. The Dallas County Defendants reserve the right to amend their disclosures to include witnesses or exhibits that they could not have reasonably anticipated to be necessary, or to respond to amendments to the other parties' disclosures made under Rules 26(a)(3)(A)(i)-(iii).

A. WITNESSES (Rule 26(a)(3)(A)(i))

Witnesses the Dallas County Defendants expect to present:

None

Witnesses the Dallas County Defendants will call if the need arises:

None.

The following witnesses will testify, if necessary, regarding attorneys' fees and costs:

Barbara Nicholas, Attorney Fees Expert
Jason Schuette, Attorney Fees Expert
c/o Dallas County Criminal District Attorney's Office
Civil Division
500 Elm Street, Suite 6300
Dallas, Texas 75202

B. DESIGNATIONS OF DEPOSITION TESTIMONY (Rule 26(a)(3)(A)(ii))

None. However, the Dallas County Defendants reserve the right to offer portions of the deposition of any witness that the opposing parties may designate pursuant to Rule 26(a)(3)(A)(ii).
See Fed. R. Civ. P. 32(a)(6).

C. DOCUMENTS AND OTHER EXHIBITS (Rule 26(a)(3)(A)(iii))

Documents and other exhibits the Dallas County Defendants expect to offer:

None.

Documents and other exhibits the Dallas County Defendants will offer if the need arises:

None.

Respectfully submitted,

JOHN CREUZOT
CRIMINAL DISTRICT ATTORNEY
DALLAS COUNTY, TEXAS

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Attorneys for Defendant Michael Scarpello in his official capacity as Dallas County Elections Administrator and Defendant John Creuzot in his official capacity as Dallas County District Attorney

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was filed electronically on July 25, 2023, with the clerk of court for the U.S. District Court, Western District of Texas, by using the CM/ECF system, causing electronic service upon all counsel of record.

/s/ Ben L. Stool

Assistant District Attorney